

REMARKS**I. INTRODUCTION**

Claims 12-31 remain pending in the present application. No new matter added has been added. Thus, in view of the following remarks, it is respectfully submitted that all of the presently pending claims are allowable.

**II. THE 35 U.S.C. § 102(e) REJECTIONS SHOULD BE WITHDRAWN**

The Examiner has rejected claims 12, 13, 23-26 and 29-31 under 35 U.S.C. § 102(e) as anticipated by U.S. Pat. No. 6,415,341 to Fry, Sr. et al. ("the Fry patent"). (See 1/12/04 Office Action, ¶ 1).

The Fry patent describes a point-of-sale (POS) system utilizing a protocol converter/print share device to interface with peripheral devices and a POS terminal. (See the Fry patent, col. 4, lines 17-20). The POS terminal is connected via its RS-485 I/O channel with the protocol converter. (Id. at col. 5, lines 16-19). The protocol converter operably converts the RS-485 commands from the POS terminal to RS-232 commands to be sent to a printer. (Id. at col. 5, lines 27-29). The protocol converter can further format commands from the POS terminal to control the peripheral devices attached to a personal computer (PC) client. (Id. at col. 5, lines 31-34).

Claim 12 of the present application is directed to a distributive service system comprising "a register device for conducting a transaction" and "a first peripheral device configured to communicate information regarding the transaction according to a first protocol" and "a protocol converter coupled to the register device and the first peripheral device, the protocol converter configured to receive information from the first peripheral device according to the first protocol and communicate the information using TCP/IP" in combination with "a

*transaction controller coupled to the protocol converter and the register device, the transaction controller operable to facilitate communication between the register device and the protocol converter.”*

The Fry patent does not disclose or suggest “a transaction controller coupled to the protocol converter and the register device, the transaction controller operable to facilitate communication between the register device and the protocol converter,” as recited in claim 12. The Examiner states that the Fry patent discloses such a transaction controller, because the print share components of the protocol converter/print share device are the equivalent of a transaction controller. (See 1/12/05 Office Action, ¶ 3). However, Applicants respectfully submit that “print share” is synonymous with “protocol converter,” not “transaction controller.” As is understood by those skilled in the art, protocol converters can offer PC/LAN sharing: Typical protocol converters may now be equipped with a standard print-sharing port, so an ASCII printer can be shared simply by attaching it to a PC/LAN network. Therefore, the “protocol converter/print share device” described in the Fry patent is simply a protocol converter with print-share capability, not “a transaction controller coupled to the protocol converter and the register device, the transaction controller operable to facilitate communication between the register device and the protocol converter,” as recited in claim 12.

Furthermore, the Fry patent states, “the purpose of the protocol converter/print share device 30 is to allow both POS terminals 12 and 14 access to printer 32.” (See the Fry patent, col. 4, lines 26-29). The Fry patent goes on to state, “protocol converter/print share device 30 is operable to convert the print commands output from POS terminals 12 and 14 to RS-232 format, prioritize those commands, and send those commands to printer 32 over the RS-232 communications link in standard ASCII format or another format understood by printer 32.” (Id. at col. 4, lines 29-34). Thus, the protocol converter/print share device may enable communication between the POS terminal and the printer, but nowhere does the Fry patent state that the protocol converter/print share device “*facilitate[s] communication between the register device and the protocol converter,*” as recited in claim 12.

In the final Office Action, the Examiner maintained the rejection of claim 12 stating

a protocol converter/print share device 30 is operable to convert the print commands output from the POS terminals. This would be the protocol converting operations. *It is also operable to prioritize those converted commands and send those converted commands to printer 32.* These operations are interpreted as transaction controller operation...[T]he protocol converter/print share device 30 acts as a transaction controller as it makes easier...

communication between the register device and the protocol converter by prioritizing commands after the commands are converted to a necessary protocol and then sending those converted commands to the printer.

(See 1/12/05 Office Action, ¶ 16) (emphasis supplied). As is evident by the Examiner's paraphrase of the Fry patent, the protocol converter/print share device 30 allows the POS terminals to communicate with the printer 32. However, claim 12 recites that the transaction controller "facilitate[s] communication *between the register device and the protocol converter.*" Prioritizing commands by the protocol converter/print share device 30 purportedly facilitates communication between the POS terminals 12, 14 and a peripheral (e.g., the printer 32). However, the Fry patent neither discloses nor suggests that the protocol converter/print share device 30 is "a transaction controller coupled to the protocol converter and the register device, the transaction controller operable to *facilitate communication between the register device and the protocol converter,*" as recited in claim 12.

The transaction controller, as defined by Applicants, facilitates communication between the register device and the protocol converter when, for example, a new peripheral is added to the system. (See Specification, p. 6, lines 17-27). The transaction controller can convert transmissions from a POS register to a format understandable by the new peripheral, and send those transmissions through the protocol converter. (Id. at p. 6, lines 20-24). The transaction controller may further receive transmissions from the new peripheral through the protocol converter, and convert those transmissions to a format understandable by the POS register. (Id. at p. 6, lines 24-27). The transaction controller allows a user to add the new

peripheral to the system without taking the system offline. Therefore, it is respectfully submitted that the Fry patent does not disclose "a transaction controller coupled to the protocol converter and the register device, the transaction controller operable to facilitate communication between the register device and the protocol converter," as recited in claim 12, and the Examiner should withdraw the rejection of this claim.

In view of the above remarks, it is respectfully submitted that claims 13, 23-26, 29 and 30, which depend from and, therefore, include the limitations of claim 12, are allowable for at least the reasons stated above. Furthermore, independent claim 31, which includes substantially the same limitations as claim 12 including "operating a transaction controller remotely located from said register device and coupled to the protocol converter and the register device, the transaction controller operable to facilitate communication between the register device and the protocol converter," should also be allowable for the reasons stated above.

#### V. THE 35 U.S.C. § 103(a) REJECTIONS SHOULD BE WITHDRAWN

The Examiner has rejected claims 14-22 under 35 U.S.C. § 103(a) as unpatentable over the Fry patent. (See 1/12/05 Office Action, ¶ 11). In view of the above remarks, it is respectfully submitted that claims 14-22, which depend from and include the limitations of claim 12, are allowable at least for the reasons stated above.

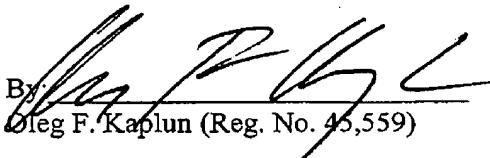
The Examiner has rejected claims 27 and 28 under 35 U.S.C. § 103(a) as unpatentable over the Fry patent in view of <http://www.sun.com/jini> ("the Sun reference"). (See 1/12/05 Office Action, ¶ 14). Claims 27 and 28, which depend from claim 12, either directly or indirectly, include the limitations of claim 12. The Sun reference does not cure the above described deficiencies of the Fry patent. Thus, the Applicants respectfully submit that claims 27 and 28 are allowable at least for the reasons stated above.

CONCLUSION

In light of the foregoing, Applicants respectfully submit that all of the pending claims are in condition for allowance. All issues raised by the Examiner having been addressed, and an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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